

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CORNWALL MANAGEMENT LTD and OLEG
SOLOVIEV a/k/a OLEG VALENTINOVICH
SOLOVIEV

Civil Action No. 12-cv-08551 (LLS)

Plaintiffs,

v.

THOR UNITED CORP. a/k/a THOR UNITED
CORPORATION, JOHN DOE THOR ENTITIES,
ATLANT CAPITAL HOLDINGS, LLC, OLEG
BATRACHENKO a/k/a OLEG
BATRATCHENKO a/k/a O.V.
BATRACHENKOV, PETER KAMBOLIN
NORTH 3RD DEVELOPMENT, LLC and
ABRAHAM BENNUN,

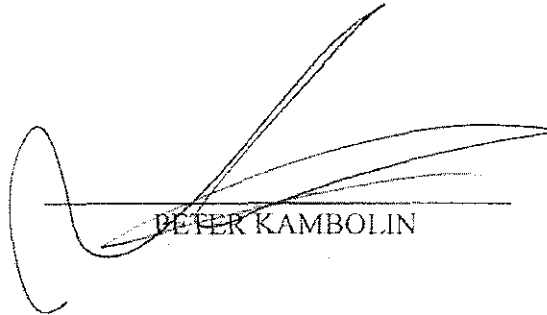
Defendants.

I, PETER KAMBOLIN, do hereby declare under the penalty of perjury pursuant to 28
U.S.C. § 1746 as follows:

1. I am a named defendant in this action and respectfully submit this Declaration in support of Defendants' Motion to Dismiss the Amended Complaint.
2. Prior to 2005, I worked with Oleg Batrachenko, also a defendant in this action, out of offices located at 551 Fifth Avenue, New York, New York.
3. Based on the conversations that we had when we worked together, I know that Mr. Batrachenko had come to the United States from Russia, and was a Russian citizen.
4. In 2005, Mr. Batrachenko left New York to return to live in Russia. To my knowledge he has been a permanent resident of Russia ever since, and currently lives in the Moscow area with his wife and children.
5. Since 2005, I have spoken with Mr. Batrachenko from time to time and he has always called me from Russia.

I declare under penalty of perjury that the foregoing statements are true and correct.

Date: April 18, 2013



PETER KAMBOLIN